

**MARKS, O'NEILL, O'BRIEN & COURTNEY, P.C.**

**PHILADELPHIA OFFICE**

SUITE 1200  
1880 JOHN F. KENNEDY BLVD.  
PHILADELPHIA, PA 19103  
(215) 564-6688  
FAX (215) 564-2526

**NEW YORK OFFICE**

530 SAW MILL RIVER ROAD  
ELMSFORD, NY 10523  
(914) 345-3701  
FAX (914) 345-3743

**MARYLAND OFFICE**

THE BONAPARTE BUILDING  
8 EAST MULBERRY STREET  
BALTIMORE, MD 21202  
(410) 385-8335  
FAX (410) 385-5883

ATTORNEYS AT LAW

SUITE 800  
913 N MARKET STREET  
WILMINGTON, DE 19801

(302) 658-6538  
FAX (302) 658-6537

**NEW JERSEY OFFICE**

SUITE 300, COOPER RIVER WEST  
6981 NORTH PARK DRIVE  
PENNSAUKEN, NJ 08109  
(856) 663-4300  
FAX (856) 663-4439

**PITTSBURGH OFFICE**

GULF TOWER, SUITE 3200  
707 GRANT STREET  
PITTSBURGH, PA 15219  
(412) 391-6171  
FAX (412) 391-8804

**BUCKS COUNTY OFFICE**

SUITE 106  
10 SOUTH CLINTON STREET  
DOYLESTOWN, PA 18901  
(267) 880-3696  
FAX (267) 880-0545

Norman H. Brooks, Jr.

May 24, 2005

The Honorable Kent A. Jordan  
United States District Court  
District of Delaware  
844 North King Street  
Lock Box 10  
Wilmington, DE 19801

VIA HAND DELIVERY &  
Electronic Filing

**Re: Baylis v. Red Lion Group, Inc.**  
**C.A. No. 04-1462 KAJ**  
**Our File No. 794-73782**

**Interim Status Report**

Dear Judge Jordan:

As per your Honor's Scheduling Order of February 15, 2005, please accept this as Defendant's Interim Status Report. As indicated by Plaintiff's report of May 23, discovery is proceeding in this matter and it is anticipated by Defendant that discovery will be completed within the period prescribed in the Court's Scheduling Order. While Plaintiff was delayed in the identification of her medical expert, Dr. David Sowa, counsel was able to amicably resolve the situation and Defendant does not object to Dr. Sowa's identification. It is my understanding that Plaintiff's expert is currently preparing his report, and upon its completion a copy will be provided

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by Plaintiff's counsel. Concerning Defendant's identification of experts, Defendant anticipates identification of its expert will occur by June 5, 2005 as per the Scheduling Order.

Defendant has scheduled and noticed the depositions of John Peters and Jerry McCarthy for June 29, 2005, in advance of the July 5, 2005 discovery completion deadline. Further, records from Plaintiff's medical treatment providers and workers compensation provider were subpoenaed so as to be received prior to the discovery deadline. Plaintiff's counsel has requested copies of these records be provided to him.

I await the May 31, 2005 Status Conference with the Court.

Respectfully Submitted,

*/s/ Norman H. Brooks, Jr. (No. 2568)*

NORMAN H. BROOKS, JR.

NHB/dpd

cc: Bayard Marin, Esq.